PREET BHARARA

United States Attorney for the

Southern District of New York

By: EDWARD B. DISKANT

Assistant United States Attorney

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| UNITED STATES DISTRICT COURT |
|-------------------------------|
| SOUTHERN DISTRICT OF NEW YORK |

UNITED STATES OF AMERICA,

.

Plaintiff,

DECLARATION OF PUBLICATION

16 Civ. 2800 (AKH)

- V. -

CERTAIN FUNDS ON DEPOSIT IN VARIOUS ACCOUNTS DETAILED HEREIN AND ALL FUNDS TRACEABLE THERETO,

:

Defendants-in-rem.

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I, EDWARD B. DISKANT, pursuant to Title 28, United States Code, Section 1746, hereby declare under penalty of perjury:

That I am an Assistant United States Attorney in the office of the United States

Attorney for the Southern District of New York, and

That attached to this declaration are (1) a true and correct copy of a notice of civil forfeiture in this action, and (2) a true and correct copy of an Advertisement Certification Report, indicating that the aforementioned notice was posted on an official government internet site (www.forfeiture.gov) for at least 30 consecutive days, beginning on April 21, 2016, as required by Rule G(4)(a)(iv)(C)of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, and

That both of the documents were obtained from a Consolidated Asset Tracking System maintained by the Department of Justice.

Dated: New York, New York July 22, 2016

____/s/_ Edward B. Diskant Assistant United States Attorney One St. Andrew's Plaza New York, New York 10007

IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK COURT CASE NUMBER: 16 CIV. 2800 (AKH); NOTICE OF FORFEITURE ACTION

Pursuant to 18 U.S.C. § 981 and 18 U.S.C. § 984, the United States filed a verified Complaint for Forfeiture against the following property:

Any and all funds including but not limited to \$8,911,024.00 on deposit in account number EE973300333500430009, in the name of Torir Inter LP at Danske Bank, Estonia, and all funds traceable thereto (16-FBI-002604)

Any and all funds including but not limited to \$284,483.00 in United States currency on deposit in account number 201100290413 at Eurobank Cyprus, Ltd., and all funds traceable thereto (16-FBI-002605)

Any and all funds including but not limited to \$7,087,347.00 in United States Currency on deposit in account number 001201100291563, in the name of Moonbigtwo at Eurobank Cyprus, Ltd., and all funds traceable thereto (16-FBI-002606)

Any and all funds including but not limited to 399,898.00 in Euros on deposit in account number 240-01-448428-01 in the name of Glendown Holdings at Hellenic Bank, Cyprus, and all funds traceable thereto (16-FBI-002607)

Any and all funds including but not limited to \$324,705.00 in United States currency on deposit in account number 240-07-448428-01 in the name of Glendown Holdings at Hellenic Bank, Cyprus, and all funds traceable thereto (16-FBI-002608)

Any and all funds including but not limited to 872,603.84 in Euros on deposit in account number HU05103000021053865248820011, in the name of "Romantick Style Ltd" at MKB Bank ZRT, Hungary, and all funds traceable thereto (16-FBI-002609)

Any and all funds including but not limited to 61,000.00 in Euros on deposit in account number HU94107001100954370250000005, in the name of "Avikom Ltd" at CIB Bank ZRT, Hungary, and all funds traceable thereto (16-FBI-002610)

Any and all funds including but not limited to \$67,800.00 on deposit in account number LT674010044100013509, at AB BND Bankas, Lithuania, and all funds traceable thereto (16-FBI-002611)

Any and all funds up to and including \$320,000.00 on deposit in account number LV54MULT1010910170010, in the name of Burgenland AG Inc. at Meridian Trade Bank, Latvia, and all funds traceable thereto (16-FBI-002612)

Any and all funds including but not limited to \$981,026.00 in United States currency on deposit in account number LV24CBBR1122808800010, in the name of Nokletto Industries Limited at Baltikum Bank AS, Latvia, and all funds traceable thereto (16-FBI-002613)

Any and all funds including but not limited to \$325,000.00 in United States currency on deposit in account number LV35RTMB0000628806803, at Reitumu Banka, Latvia, and all funds traceable thereto (16-FBI-002614)

Any and all funds including but not limited to \$2,362,506.00 in United States currency on deposit in account number LV86AlZK0000010395370, in the name of Exellit Sales LLP at ABLV Bank AS, Latvia, and all funds traceable thereto (16-FBI-002615)

Any and all funds including but not limited to \$184,093.00 in United States currency on deposit in account number LV27AIZK0000010385083, in the name of Exgold Import LLP at ABLV Bank AS, Latvia, and all funds traceable thereto (16-FBI-002616)

Any and all funds including but not limited to \$636,900.00 in United States currency on deposit in account number LV69KBRB1111217256001, in the name of Deltaway Systems LP at Trasta Komercbanka, Latvia, and all funds traceable thereto (16-FBI-002617)

Any and all funds including but not limited to \$3,030.90 in United States currency on deposit in account number LV43RTMB0000179806172, in the name of Max Crown S.A. at Reitumu Banka, Latvia, and all funds traceable thereto (16-FBI-002618)

Any and all funds including but not limited to \$67,520.37 on deposit in account number LV78LATB0006020137348, maintained in the name of "Ideals Solutions Group S.A.," at Norvik Banka JSC, Latvia, and all funds traceable thereto (16-FBI-002619)

Any and all funds including but not limited to \$2,911,745.26 on deposit in account number LV65KBRB1111216560001, maintained in the name of "Privaled Construction LP" at Trasta Komercbanka, Latvia, and all funds traceable thereto (16-FBI-002620)

Any and all funds including but not limited to \$3,836,200.00 on deposit in account number LV72KBRB1111232037001, maintained in the name of "Corwald Transit LP" at Trasta Komercbanka, Latvia, and all funds traceable thereto (16-FBI-002621)

Any and all of the funds including but not limited to \$342,056.40 in United States currency on deposit in account number SK886500000000020534640, at Postova Bank AS, Slovakia, and all funds traceable thereto (16-FBI-002622)

Any and all funds including but not limited to \$240,000.00 in United States currency on deposit in account number 848560678838 in the name Dingseng HK Co. Ltd., at HSBC Bank, Hong Kong, and all funds traceable thereto (16-FBI-002623)

Any person claiming a legal interest in the Defendant Property must file a verified Claim with the court within 60 days from the first day of publication (April 21, 2016) of this Notice on this official government internet web site and an Answer to the complaint or motion under Rule 12 of the Federal Rules of Civil Procedure within 21 days thereafter. 18 U.S.C. § 983(h)(1) permits a court to impose a civil fine on anyone asserting an interest in property which the court determines was frivolous.

The verified Claim and Answer must be filed with the Clerk of the Court, United States District Court, 500 Pearl Street, Room 120, New York, NY 10007, and copies of each

served upon Assistant United States Attorney Edward B. Diskant, One St. Andrew's Plaza, New York, NY 10007, or default and forfeiture will be ordered. <u>See</u>, 18 U.S.C. § 983(a)(4)(A) and Rule G(5) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions.



Advertisement Certification Report

The Notice of Publication was available on the www.forfeiture.gov web site for at least 18 hours per day between April 21, 2016 and May 20, 2016. Below is a summary report that identifies the uptime for each day within the publication period and reports the results of the web monitoring system's daily check that verifies that the advertisement was available each day.

U.S. v. Certain Funds

Court Case No: 16 CIV. 2800 (AKH)

For Asset ID(s): See Attached Advertisement Copy

| Consecutive Calendar Day Count | Date Advertisement Appeared on the Web Site | Total Hours Web Site was Available during Calendar Day | Verification that Advertisement existed on Web Site |
|--------------------------------------|---|--|---|
| 1 | 04/21/2016 | 20.6 | Verified |
| 2 | 04/22/2016 | 24.0 | Verified |
| 3 | 04/23/2016 | 24.0 | Verified |
| 4 | 04/24/2016 | 24.0 | Verified |
| 5 | 04/25/2016 | 24.0 | Verified |
| 6 | 04/26/2016 | 24.0 | Verified |
| 7 | 04/27/2016 | 24.0 | Verified |
| 8 | 04/28/2016 | 24.0 | Verified |
| 9 | 04/29/2016 | 24.0 | Verified |
| 10 | 04/30/2016 | 24.0 | Verified |
| 11 | 05/01/2016 | 24.0 | Verified |
| 12 | 05/02/2016 | 24.0 | Verified |
| 13 | 05/03/2016 | 24.0 | Verified |
| 14 | 05/04/2016 | 24.0 | Verified |
| 15 | 05/05/2016 | 24.0 | Verified |
| 16 | 05/06/2016 | 24.0 | Verified |
| 17 | 05/07/2016 | 24.0 | Verified |
| 18 | 05/08/2016 | 24.0 | Verified |
| 19 | 05/09/2016 | 24.0 | Verified |
| 20 | 05/10/2016 | 24.0 | Verified |
| 21 | 05/11/2016 | 24.0 | Verified |
| 22 | 05/12/2016 | 24.0 | Verified |
| 23 | 05/13/2016 | 24.0 | Verified |
| 24 | 05/14/2016 | 24.0 | Verified |
| 25 | 05/15/2016 | 24.0 | Verified |
| 26 | 05/16/2016 | 24.0 | Verified |
| 27 | 05/17/2016 | 24.0 | Verified |
| 28 | 05/18/2016 | 24.0 | Verified |
| 29 | 05/19/2016 | 24.0 | Verified |
| 30 | 05/20/2016 | 24.0 | Verified |

Additional log information is available and kept in the archives for 15 years after the asset has been disposed.